

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of:

Review of the Section 251 Unbundling  
Obligations for Incumbent Local Exchange  
Carriers

CC Docket No. 01-338

Implementation of the Local Competition  
Provisions of the Telecommunications Act of  
1996

CC Docket No. 96-98

Deployment of Wireline Services Offering  
Advanced Telecommunications Capability

CC Docket No. 98-147

**SBC'S REQUEST FOR WAIVER OF PAGE LIMIT**

On October 2, 2003, nine Petitions for Reconsideration of the Commission's *Triennial Review Order* were filed ("Petitions"). On October 9, 2003, the Commission issued a Public Notice requesting oppositions to the Petitions within 15 days of the date of public notice of the Petitions in the Federal Register, which occurred on October 22, 2003, and replies 10 days after the deadline for oppositions. On November 6, 2003, 20 sets of Comments were filed on the Petitions. Neither the Public Notice nor the Federal Register specify whether parties shall file a single reply document to the Comments, or separate documents for each Petition or each issue raised by the original Petitions. The Public Notice and Federal Register also are silent as any page limits for replies.

Pursuant to Rule 1.49(f), replies to petitions for reconsideration shall not exceed 10 pages. Thus, in the normal course, the page limit for each party in responding to each of the Petitions would be 10 pages. However, for the sake of efficiency, SBC has chosen to file a single document in response to all of Comments on the Petitions rather than

separate replies. The Petitions and Comments address several discrete issues of fundamental importance, and a response of more than 10 pages is required in order to thoroughly address all of the issues. Accordingly, given the breadth of the issues and the volume of the Comments, in the event that Rule 1.49(f) is deemed to apply to SBC's reply, SBC respectfully requests that the Commission grant a waiver of the rule.

Respectfully submitted,

/s/ Jim Lamoureux

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November 17, 2003